

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

---

**EMILIO TORRES**, an individual,  
Plaintiff,

Case No. 18-CV-766  
Hon. Hala Y. Jarbou

v.

**SALVATORE VITALE**, an individual, and  
**BELINDA PIERSON**, an individual,  
jointly and severally,  
Defendants.

<b>AVANTI LAW GROUP, PLLC</b> Robert Anthony Alvarez (P66954) Attorneys for Plaintiff 600 28th St. SW Wyoming, MI 49509 (616) 257-6807 <a href="mailto:ralvarez@avantilaw.com">ralvarez@avantilaw.com</a>	<b>RHOADES MCKEE, PC</b> Hal Ostrow (P63999) Ian A. Northon (P65082) Catherine Brainerd (P70202) Patrick Sweeney (P79822) Attorneys for Defendants 55 Campau Ave. N.W., Suite 300 Grand Rapids, MI 49503 (616) 235-3500 <a href="mailto:ian@rholdesmckee.com">ian@rholdesmckee.com</a>
---	---

**MOTION FOR LEAVE TO FILE**  
**PLAINTIFF'S SECOND AMENDED CLASS ACTION COMPLAINT**

**ORAL ARGUMENT REQUESTED**

Plaintiff, by and through his undersigned counsel, pursuant to Fed. R. Civ. P. 15(a)(2), hereby moves this Court to grant him leave to file his proposed Second Amended Class Action Complaint. In support of his Motion for Leave to File Plaintiff's Second Amended Class Action Complaint, Plaintiff relies upon his Brief in Support as well as his proposed Second Amended Class Action Complaint attached to his Brief in Support as Exhibit 1.

WHEREFORE, Plaintiff requests that this Court grant him leave to file his proposed Second Amended Class Action Complaint, and grant such other relief as the Court deems just and proper.

Respectfully Submitted,

Dated: November 2, 2020

/s/ Robert Anthony Alvarez.

Robert Anthony Alvarez (P66954)

Attorney for Plaintiff

Avanti Law Group. PLLC